

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

NELSON L. BRUCE,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,  
LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC., TRANS UNION, LLC,  
and UNKNOWN DOES 1-100

Defendants.

CASE NO.: 2:21-cv-03603-BHH-MGB

**DEFENDANT TRANS UNION LLC’S RESPONSE TO  
PLAINTIFF’S REPLY AND OBJECTIONS TO TRANS UNION’S  
ANSWER AND DEFENSES TO PLAINTIFF’S SUPPLEMENTAL COMPLAINT**

COMES NOW, Trans Union LLC (“Trans Union”), and files its Response to Plaintiff Nelson L. Bruce’s (“Plaintiff”) Reply and Objections to Trans Union’s Answer and Defenses to Plaintiff’s Supplemental Complaint (“Reply”) and would respectfully show the Court as follows:

1. On August 5, 2022, Trans Union filed its Answer and Defenses to Plaintiff’s Supplemental Complaint [ECF No. 69].
2. Plaintiff filed his Reply on August 15, 2022 [ECF No. 73]. Such Reply is improper under the Federal Rules of Civil Procedure, and the relief sought in the Reply is not supported by any authority.

Respectfully Submitted,

s/ Wilbur E. Johnson

Wilbur E. Johnson, Federal ID No.: 2212

Clement Rivers, LLP

25 Calhoun Street, Suite 400

Charleston, SC 29401

Tel: (843) 724-6659

Email: [wjohnson@ycrlaw.com](mailto:wjohnson@ycrlaw.com)

***Counsel for Trans Union LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of August 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

Rita Bolt Barker  
[rbarker@wyche.com](mailto:rbarker@wyche.com)  
Wyche PA  
200 E Camperdown Way  
Greenville, SC 29601  
***Counsel for Equifax Information Solutions, LLC***

Lyndey Ritz Zwing Bryant  
[lyndey.bryant@arlaw.com](mailto:lyndey.bryant@arlaw.com)  
Luke Montgomery Allen  
[luke.allen@arlaw.com](mailto:luke.allen@arlaw.com)  
Adams and Reese LLP  
1501 Main Street, Fifth Floor  
Columbia, SC 29201  
***Counsel for Experian Information Solutions, Inc.***

I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

Nelson L. Bruce  
PO BOX 3345  
Summerville, SC 29484-3345  
***Pro Se Plaintiff***

s/ Wilbur E. Johnson  
**WILBUR E. JOHNSON**